

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FILE

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MAY 29 1992

Federal Communications Commission
Office of the Secretary

In the Matter of

The Use of N11 Codes and Other
Abbreviated Dialing Arrangements

CC Docket No. 92-105

REQUEST FOR AN EXTENSION OF TIME
TO FILE COMMENTS BY THE
NATIONAL ASSOCIATION OF
REGULATORY UTILITY COMMISSIONERS

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May 29, 1992

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REGULATORY UTILITY COMMISSIONERS

Pursuant to Sections 1.46 and 1.44 of the Federal Communication Commission's ("FCC" or "Commission") General Rules of Practice and Procedure, 47 C.F.R. Sections 1.46 and 1.44 (1991), the National Association of Regulatory Utility Commissioners ("NARUC") respectfully requests that the Commission extend the time for filing comments in these proceedings approximately 60 days from June 5, and June 22, 1992 to August 7 and August 24, 1992. In support of this request, NARUC states the following:

I.

NARUC is a quasi-governmental nonprofit organization founded in 1889. The NARUC includes within its membership those governmental bodies of the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands, which engage in the regulation of carriers and utilities.

NARUC's mission is to improve the quality and effectiveness of public utility regulation in America. More specifically, NARUC is composed of the State officials charged with the duty of regulating the telecommunications common carriers within their respective borders. As such, they have the obligation to assure the establishment of such telecommunications services and facilities as may be required by the public convenience and necessity, and the furnishing of service at rates that are just and reasonable. Any FCC action concerning BellSouth's request in this docket will have an impact upon this obligation.

II.

On May 6, 1992, the FCC issued a Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding seeking public comment on BellSouth's March 6, 1992 filed petition for a declaratory ruling. The petition, inter alia, asks the FCC to declare that "...the use, allocation, and assignment of a limited number of pay-per-call type information services via local exchange service arrangements that include network-based rating, recording, and billing capabilities, are consistent with the Communications Act and the Commission's policies to the extent that the Commission has jurisdiction over such issues." BellSouth Petition at 1-2.

In the NPRM the FCC seeks to "address the broad questions surrounding assignment of N11 codes," concluding that "...N11 codes should be available for abbreviated dialing unless ...it['s]... necessary to use...[them]...as area codes." NPRM at 2 & 5.

III.

NARUC has already petitioned the FCC in another proceeding to issue a Notice of Inquiry, seeking information and comment regarding the many considerations and issues relevant to the North American Number Plan's administration - citing (i) the possibility that assignment of various codes, particularly at the local level, may promote or favor particular industry players, (ii) the potential impact on local ratepayers, and the clear need for input from state regulators, user and other affected telecommunications industry groups. Currently, state commissions frequently play a role in implementation, at the local level, of various aspects of the NANP, e.g., area code ("NPA code") splits/overlays, etc. BellSouth proposal raises issues concerning local implementation.

IV.

The May 6, 1992 notice sets (i) June 5, 1992 as the date for interested persons to file initial comments on the FCC's proposed response, and (ii) June 22, 1992 as the day to file reply comments.

V.

NARUC is holding its summer meetings during the last week of July, only a month after the final deadline for filing reply comments. Because of the importance of the issues presented by the NPRM, discussions of BellSouth's petition are ongoing among the responsible committees. However, it will not be possible to achieve a formal consensus position until the summer meeting.

VI.

NARUC has already asked for FCC action on the generic aspects of NANP administration. BellSouth's proposal also (i) clearly raises issues of concern to the NARUC's state commission membership and (ii) could impact upon these members' ability to adhere to their respective mandates to serve the public interest. No other participant's filed initial and reply comments can adequately represent the viewpoint of NARUC and its membership.

This viewpoint is necessary to fully illuminate the issues raised by the BellSouth's proposal and assure a complete record upon which to base a decision. Hence, granting the requested extension will serve the public interest by ensuring NARUC's participation.

VI.

Moreover, no party can be significantly prejudiced by the delay. Because NARUC's summer meeting begins closely on the heels of the originally proposed filing dates, only a short extension is necessary to assure NARUC's full participation.

VII.

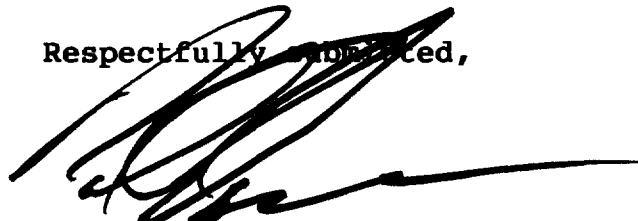
Accordingly, because of the critical importance of the issues raised by the FCC's NPRM to NARUC's membership, the close proximity of NARUC's summer meeting to the deadlines already posed, and NARUC's inability to formulate a consensus position on those issues

NARUC'S MAY 29, 1992 REQUEST FOR AN EXTENSION OF TIME

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until its summer meeting, NARUC respectfully requests an extension of time to file reply comments in the above-captioned proceeding.

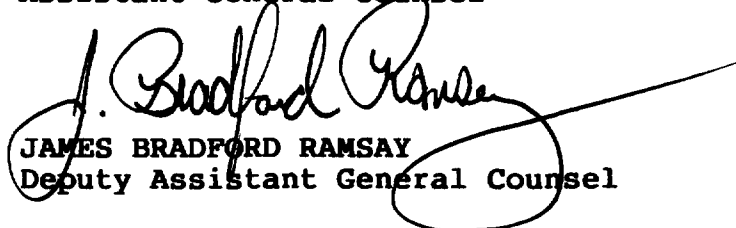
Respectfully submitted,



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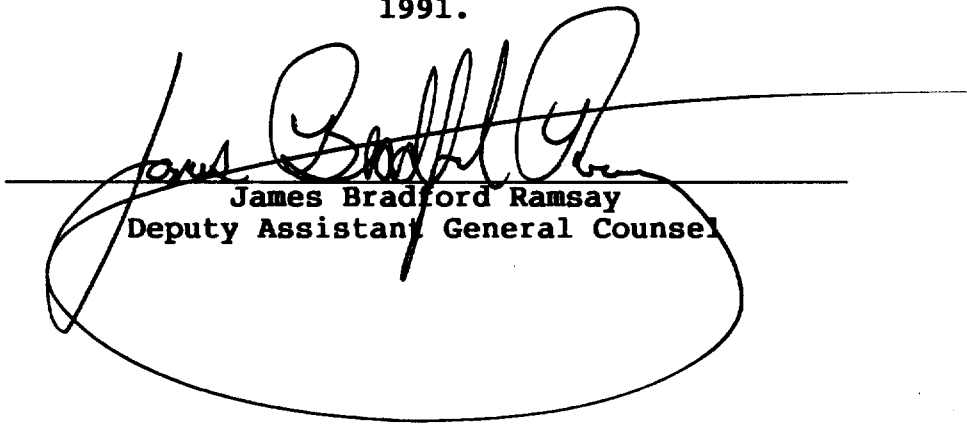
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CERTIFICATE OF SERVICE

I, JAMES BRADFORD RAMSAY, certify that I have served a copy of the foregoing on all the parties on the attached service list by first class mail, postage prepaid, this 5th day of February, 1991.



James Bradford Ramsay
Deputy Assistant General Counsel

May 29, 1992

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